

REMARKS/ARGUMENTS

Claims 2 and 4 are the independent claim. Claims 1 and 3 are withdrawn. Claims 2 and 4 are pending in the application. Claims 2 and 4 are amended. Reexamination and reconsideration of the application are respectfully requested.

The present invention is directed to a system of managing image data in a network (*see Abstract*).

CLAIM REJECTION UNDER 35 U.S.C. § 103

Claim 4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hull (U.S. 5,978,477); claim 2 stands rejected under the same over Hull in view of Davis (U.S. 6,549,638). Applicant respectfully traverses the rejection herein.

Independent claim 2 of present invention is recited below:

A system of managing image data in a network, comprising:
an image input device;
an image forming device including storage means for storing image data inputted by the image input device, and connecting directly to the image input device,
at least one of the image input device and the image forming device being connected to the network; and
a client computer, connected to the network, for managing the image data stored in the storage means via the network,
wherein the image forming device further includes a converter and a network interface;
the storage means comprises a binary data storage section for storing the image data as binary data and a text data storage section for storing text data converted from the binary data by the converter; and
the network interface includes a software for managing the text data, and transmits the text data stored in the text data storage section to the client computer.

The applied reference does not disclose or suggest the above features of the present invention as defined by amended independent claim 2. In particular, Hull

and Davis do not disclose or suggest “an image forming device ... connecting directly to the image input device” as required by that claim.

Hull teaches a system having a digital copier **106**, a fax machine **110**, and a print server **104** connected via a network **100** (*Hull FIG. 1*). The Action identifies the controller **306**, disk **310**, and print engine **304** of the digital copier **106** as the “image forming device”, and the scanner portion **302A** and the image processing unit **302B** of the same digital copier **106** as the “image input device.”

Applicant respectfully submits that construction is unreasonable. The controller **306**, disk **310**, print engine **304**, the scanner portion **302A**, and the image processing unit **302B** are all part of the digital copier **106** (*Hull FIG. 3*). As illustrated in FIG.1 of Hull, the digital copier **106** is but one device, and cannot be said to constitute both the “image forming device” and the “image input device.”

Moreover, since the purported portions of the “image forming device” and the “image input device” are actually parts of a device; they cannot be said to be connected either directly or indirectly.

Davis is not seen to remedy the deficiencies of Hull. FIG. 1 of Davis illustrates that a scanner **18** and a printer **20** both connect to a computer **10**. The scanner **18** and the printer **20** are thus not connected directly as recited in the application.

In contrast, amended independent claim 2 recites an image input device and an image forming device connecting directly to the image input device, and not via a network. Accordingly, the network load is reduced. (*See Applicant's specification FIG. 3A and 3B; second embodiment and third embodiment starting at page 10 of the specification*). The image data stored from a image input device can be send to an image forming device without adding network workload. The advantages are not seen to flow from the teaching of Hull and Davis.

Since the Hull and Davis do not disclose or suggest all the features of independent claim 2 as amended, those applied references cannot render the present application unpatentable. Reconsideration and allowance of the amended independent claim 2 are respectfully requested.

Moreover, Applicant respectfully submits that independent claim 4 recites similar features as independent claim 2 and is thus allowable for at least the same reasons as of independent claim 2. Reconsideration and allowance of the amended independent claim 4 are thus also respectfully requested.

CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (310) 785-4600 to discuss the steps necessary for placing the application in condition for allowance.

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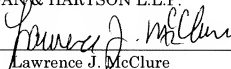
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Respectfully submitted,

HOGAN & HARTSON L.L.P.

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By: _____



Lawrence J. McClure
Registration No. 44,228
Attorney for Applicant(s)

1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Phone: 310-785-4600
Fax: 310-785-4601